

It isn't often that we happen across unbelievable opportunities, but as an interpreter of Video Relay Service (VRS) provider, I truly have found a wonderful and unbelievable opportunity where I assist Deaf individuals in communicating by videophone in American Sign Language using VRS. This is a vital service that I and others enjoy providing. It is an empowering service and the Deaf Community needs VRS!

The Americans with Disabilities Act (ADA) was passed in order to see that the Deaf Community have access to "functionally-equivalent" communications. Not only should telecommunications service and national access be functionally equivalent, but technology improvements and efficiency for Deaf telecommunication should continue and thrive—not be halted.

The FCC's current proposal would not allow for continued outreach, educational, and training endeavors which are vital programs for the Deaf Community. The current proposal would not allow for new technologies—new phone features to be developed, tested, and distributed to our Deaf citizens.

The FCC should be increasing the availability and use of VRS, not cutting back. You should adopt a rate that encourages continuing improvements in VRS technology and continues to improve service levels.

Recent developments in VRS are a good example of how the service can be improved, such as enhanced 911 services, 10-digit numbering, a larger and better-trained pool of interpreters and better videophones with an array of enhanced features. Monthly payments for broadband are a big expense for many Deaf people, and instead of trying to cut back on VRS, you should be exploring ways to make VRS over broadband more affordable to Deaf individuals.

I was shocked and very troubled by the Commission's recent Public Notice on VRS rates. These proposals would put an end to VRS as we know it. My employer has already informed me that if these proposed rates are adopted, our company would head into bankruptcy. This would be disastrous for Deaf VRS users. I was even more shocked as I followed other FCC statements:

You may have seen claims that the video relay service (VRS) program is threatened. This is not true. The FCC is committed to ensuring the provision of high quality VRS to all individuals who need this service. The Americans with Disabilities Act (ADA) requires telecommunications access that is functionally equivalent to voice telephone services for people who are deaf, hard of hearing, or have speech disabilities. The FCC continues to believe that VRS is the most functionally equivalent form of relay for people who communicate using American Sign Language (ASL). We stand ready to meet our obligation to preserve and protect the VRS program so that ASL users and hearing people can communicate with each other over distances. This was the goal of Congress in passing the ADA and it continues to be our goal.

Here are the facts: On April 30th, the FCC released a Public Notice (DA-10-761A1.doc) asking the general public for feedback on what VRS providers should be paid to handle VRS calls for the next year. The Public Notice seeks comment on reimbursing providers based on the actual costs that VRS providers themselves claim to have incurred over the past few years to provide VRS. The only way to safeguard the VRS program is to adopt reasonable rates for all forms of relay services. Thus, it is our goal to adopt rates that are rationally based on the reasonable costs of actually providing VRS. We welcome all comments on our Public Notice, and will take all feedback into account to determine the next VRS rates. The VRS program will continue to provide the excellent communication service that you need.

FCC, one of your statements denies the VRS program being threatened?that is not accurate. The VRS program is indeed threatened by the low rates you have proposed. If you aim to ?preserve and protect the VRS program? you simply must pass fair rates. You also stated that ?the only way to safeguard the VRS program is to adopt reasonable rates for all forms of relay services?it is [your] goal to adopt rates that are rationally based on the reasonable costs of actually providing VRS.? The fact of the matter is that safeguarding the VRS program means continued technological advancements, continued outreach and education efforts, and continued interpreter training efforts.

It is public knowledge that the image of VRS has been tainted by some individual interpreters and by some VRS providers; it is a shame and a disgust. It seems that the reasonable approach would be punitive action toward those individuals and those companies who knowingly committed fraud.

Without reservation, I can say that I am honored to work for Sorenson Communications, a company that has operated within FCC guidelines. We have worked as a company of integrity from the onset. We have nothing to hide from the FCC?we have high standards because we aim to ?offer the highest-quality communications products and services to all Deaf and Hard-of-Hearing? ?this means that we are working hard to advance our products, continuing to enhance our interpreting services, and maintaining active participation in the Deaf Community to further outreach and educational services. We in no way aim to misuse the VRS fund! We want to continue to use these monies in a good and positive way that allow us to continue serving Deaf citizens with the services and opportunities that hearing citizens enjoy.

FCC, please spend more of your time and energy focusing on eliminating fraud?not punishing a company who has worked according to your guidelines and promoted integrity within the VRS industry.

Please look for a fair and predictable rate for VRS so that we can invest in the future of our Deaf Community by way of improving VRS and outreach services. Please consider a multi-year VRS rate as we continue to strive for functional equivalence as is mandated by the ADA.

Your proposed rate would indeed destroy the progress we've made, we would regress and move much further from the goals set forth by the ADA. Do not deter us from advancements and progress. You would do so if you approve your proposed rate. It would indeed mean the end of VRS as we know it. Sorenson, the leader in the VRS industry, would not be able to survive which would lead to the fall of other VRS providers. The Deaf Community would suffer without the services Sorenson provides.

Make the right decision; do the right thing. Please do not approve your proposed rate?it would be a disaster, it would be unjust, and you would be hurting the Deaf Community.

Sincerely,  
Vanghi Hardin  
Sorenson Communications